

Section 4.0 - Specification for Community Air Monitoring
Submission Date: May 16, 2008

Title **Section 4.0 - Specification for Community Air Monitoring**

Amendment #2 REV02

Reason for the Amendment

Crystalline silica is a common mineral that can be found in a wide range of building products (e.g., concrete) as well as urban soil and road dust. Low levels of respirable crystalline silica can be released in to the air from a multitude of sources that may include nearby construction activities, road traffic during dry weather conditions, etc. As a result, a systematic procedure for evaluating exceedances of the site specific trigger level for respirable crystalline silica has been developed to minimize unnecessary work stoppages.

Silica Exceedance Investigation Procedure

In the event of a Silica Exceedance, RJ Lee Group (RJLG) will notify the EPA within one hour after the initial receipt of the reviewed and validated lab data following any and all EPA Site Specific Trigger Level silica exceedances on the 130 Cedar St. site. During this one hour time frame, RJLG will determine whether they believe the exceedance is or is not related to ongoing activities at 130 Cedar St. This determination will involve the completion of an Exceedance Checklist by RJLG that will summarize information for the day of the exceedance such as 130 Cedar St. activities, surrounding site activities, surrounding street activities, PM readings and weather conditions. The Exceedance Checklist will then be provided to the EPA as part of the notification process. Based upon the information provided in the Exceedance Checklist, RJLG and the EPA will jointly determine the cause of the exceedance and whether or not a work stoppage is warranted. Work will not stop during the one hour time frame required to complete the assessment. Should RLG not be successful in contacting the EPA for notification, RJLG will initially make the determination on the cause of the exceedance and whether or not work stoppage is warranted. A follow up discussion will then occur when the EPA becomes available to discuss the initial determination made by RJLG.

If the assessment determines that an exceedance of the EPA Site Specific Trigger Level for silica is associated with activities at 130 Cedar St., the exceedance will result in a work stoppage until an evaluation of emission controls is performed and corrective action acceptable to the EPA is in place. It should be noted that only silica-generating activities that are determined to be associated with the exceedance will stop (e.g. if on-site concrete

handling/distribution activities are determined to be associated with the exceedance, these activities will stop, whereas other activities such as abatement/remediation work, which may be determined to not be associated with the exceedance, will continue). The regulatory agencies will make the final determination of what work will stop. If the assessment determines that an exceedance of the EPA Site Specific Trigger Level for silica is not associated with activities at 130 Cedar St., a work stoppage will not be required. A subsequent, detailed Exceedance Report will follow later the same day (no later than 24 hours following the initial receipt of validated lab data by RJLG).

Sub-sections of the Specification affected:

Sub-sections 6.0 & 6.1

Date Implemented: May 16, 2008